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Kellan Patterson, Attorney for TASHAE DAVIS

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

TASHAE DAVIS, as an individual

Plaintiff,

vs.

TIFFANY HARRISON, as an individual,

Defendant.

Case No.

COMPLAINT FOR DAMAGES

1. Defamation – Libel
2. Defamation – Libel Per Se
3. Defamation – Slander
4. Defamation – Slander Per Se
5. Intentional Infliction of Emotional Distress

JURY TRIAL DEMANDED

SUMMARY OF THE CASE

1. This action arises out of and relates to the wrongful conduct of TIFFANY HARRISON, Defendant, resulting in a statutory violation of defamation and intentionally causing severe emotional distress to TASHAE DAVIS, Plaintiff. Plaintiff alleges as follows:

PARTIES

2. Plaintiff TASHAE DAVIS, hereinafter referred to as “Ms. DAVIS” or “Plaintiff”, is a law-abiding citizen who resides in Sacramento County.

3. Defendant TIFFANY HARRISON (aka Tiffany Shabazz), hereinafter referred to as “Ms. HARRISON” or “Defendant”, is now, and at all times mentioned in this complaint, a 42-year-old

female adult residing in Lacey, a city in Thurston County, in the state of Washington.

JURISDICTION AND VENUE

4. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § 1332(a), wherein the amount in controversy in this case exceeds \$75,000 and complete diversity of citizenship exists, as Plaintiff and Defendant are domiciled in different states.

5. Venue is proper in Eastern District of California, Sacramento Division pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to this claim occurred and or was aimed towards Plaintiff who was a resident of Sacramento, California.

GENERAL ALLEGATIONS

Relevant Facts

6. In May 2021, DEFENDANT, Ms. TIFFANY HARRISON, began falsely accusing and slandering PLAINTIFF, Ms. TASHAE DAVIS, via text message and social media platforms including CaringBridges.com, Facebook, Instagram, GoFundMe, CashApp, Change.org, and YouTube.

7. These posts, texts, and petitions include but are not limited to Ms. HARRISON falsely accusing Ms. DAVIS of abusing and neglecting her brother, Iman Shabazz, kidnapping and holding Iman hostage, attempted murder and eventual murder of Iman, blackmail, and Ms. DAVIS' association with sexual assault crimes based on accusations against her younger brother, Ashante Deaton.

8. Ms. HARRISON is Iman's alleged spouse and the mother of his three children.

9. When Ms. HARRISON began her false accusations and slander against Ms. DAVIS, Ms. HARRISON and Iman were not in a relationship and had not been together for at least three years before Iman's accident in April 2021.

10. Ms. HARRISON petitioned for permanent conservatorship of Iman but was denied. Ms. HARRISON married Iman under her temporary conservatorship one day before the conservatorship expired.

11. Iman is Ms. DAVIS' older brother by 10 years. Ms. DAVIS lived with Iman when she was about one or two years old until he moved out from their home about five years later. Their

1 communication and relationship continued after Iman moved away, as he still lived within the
2 same community. Ms. DAVIS would often see Iman around the neighborhood, and he would take
3 her out to the park and get ice cream together.

4 12. Ms. DAVIS' and Iman's relationship changed when Ms. DAVIS turned 15 or 16 years
5 old. Iman moved from their neighborhood and started seeing Ms. HARRISON romantically. At
6 this time, Iman was living with Ms. DAVIS' eldest sister, Katonya Brittingham.

7 13. Katonya wanted Iman to live with her due to his continued drug abuse. Iman lived with
8 Katonya for a short while to stop using drugs and get better. Katonya believed that Iman and Ms.
9 HARRISON were using drugs such as heroin, crack cocaine, and other opioids.

10 14. Ms. DAVIS first met Ms. HARRISON in 2009 at Ms. DAVIS' and Iman's sister's, Lorine
11 Haile's, residence in Sacramento, California, when Ms. DAVIS was 19 years old. During this
12 time, Ms. DAVIS and Lorine were preparing for Ms. DAVIS' and Iman's father's funeral. Iman
13 introduced Ms. HARRISON to Ms. DAVIS as his girlfriend. Ms. HARRISON had just given
14 birth to their daughter, who was only a few months old.

15 15. Iman never mentioned Ms. HARRISON to Ms. DAVIS. Ms. DAVIS observed that Ms.
16 HARRISON was nice but not very talkative. However, Ms. DAVIS was excited to meet her new
17 niece, as she had not communicated with Iman for some time. She knew he was living with
18 Katonya during this period.

19 16. After the funeral, Iman became more present in Ms. DAVIS' life. Ms. DAVIS recently
20 moved back to Sacramento from the Bay Area. Iman and Ms. HARRISON were living together in
21 the Sacramento region as well, with their daughter and Ms. HARRISON's 5-year-old son. Ms.
22 HARRISON had this child with another man; this prior relationship was allegedly abusive.

23 17. Ms. DAVIS would spend time with Iman and his family, often meeting for family
24 barbeques and holiday celebrations.

25 18. In February 2021, Iman suffered a stroke.

26 19. Iman called Ms. DAVIS to explain his health condition. He lost his vision, specifically his
27 peripheral vision, and needed to go to the emergency room.
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1 20. During this time, Iman was living with his aunt and uncle in Richmond, California. Since
2 he and Ms. HARRISON ended their relationship three years before his stroke, Iman was not
3 living with her. Before living with his aunt and uncle, Iman lived with his sister Lorine for a short
4 time in her garage, with a few of his friends, or on the streets. Ms. DAVIS does not know when
5 Iman lived on the streets.

6 21. Ms. HARRISON allegedly filed a few restraining orders against Iman due to Ms.
7 HARRISON's allegations that Iman wanted to stalk and kill Ms. HARRISON and their kids.

8 22. Ms. HARRISON also accused Iman of attempting to harm her by intentionally tampering
9 with her car. Ms. HARRISON posted these accusations on social media.

10 23. Ms. DAVIS confronted Ms. HARRISON about her accusations and asked that she remove
11 the post. Ms. DAVIS expressed that Iman would never do any of the actions Ms. HARRISON
12 accused him of; however, Ms. HARRISON refused to believe her.

13 24. After posting the allegations, Ms. HARRISON moved her and her children out of state to
14 her godparents' home. Ms. HARRISON and her children eventually moved into a domestic
15 violence shelter and home in Washington state.

16 25. Ms. HARRISON did not ask for Iman's consent when moving their children.

17 26. Ms. HARRISON allegedly filed an action against Iman in Sacramento County Superior
18 Court.

19 27. At this time, Iman was suspected of abusing drugs and alcohol.

20 28. Ms. HARRISON allegedly convinced and manipulated their children to stop interacting
21 with Iman. Ms. HARRISON allegedly instilled fear so that their children would not want to visit
22 or talk with Iman regularly.

23 29. On April 1, 2021, Ms. DAVIS learned that Iman was hit by a car on California Highway
24 99 near Longview. She immediately visited the hospital Iman was located at before Lorine and
25 Ms. HARRISON joined the following day.

26 30. Due to Covid-19, only two visitors were allowed for each patient for the extent of their
27 stay and only one visitor could visit at a time. Ms. DAVIS and Lorine took turns visiting Iman
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1 every day.

2 31. Iman's injuries were severe. He lost his leg on impact, suffered a traumatic brain injury
3 (TBI), damaged multiple organs, and lost most of his body's normal blood supply. After multiple
4 surgeries, he was in an induced coma and on life support. As a result of these injuries, Iman's
5 doctors were doubtful of his survival. Lorine and Ms. DAVIS asked the medical staff to do
6 everything they could to keep him alive.

7 32. Iman remained in the hospital for 3 months.

8 33. Ms. HARRISON was eventually allowed to see Iman. During her visit, Ms. HARRISON
9 took a video of her telling Iman that Ms. DAVIS a part of a molestation ring with her younger
10 brother. She also stated that Ms. DAVIS and her family were trying to kill him.

11 34. Ms. DAVIS spoke with the hospital social worker about Ms. HARRISON's conduct and
12 wrote a letter to advocate against her visitation. The hospital staff approved and prohibited Ms.
13 HARRISON from visiting in person. However, the staff allowed her to make phone calls.

14 35. Ms. DAVIS wanted Iman to continue his relationship with his kids and therefore wanted
15 to come to an agreement with Ms. HARRISON. However, Ms. HARRISON called Iman and
16 demanded that he put her on his visitor's list if he wanted to see his kids.

17 36. During this time, Ms. HARRISON began to use the molestation allegations for Ms.
18 DAVIS' younger brother, Ashante, against Ms. DAVIS and Lorine. Ms. HARRISON knew
19 specific details of these allegations and would threaten Ms. DAVIS by spreading the details to
20 family members and friends through social media as a means of leverage to blackmail Ms.
21 DAVIS into allowing Ms. HARRISON to visit Iman in the hospital, in order to manipulate Iman
22 to give her power of attorney.

23 37. Ms. HARRISON's alleged motive was receiving any potential money from Iman.

24 38. In June 2021, Ms. DAVIS sent a text message to Ms. HARRISON claiming that she is a
25 liar as it pertained to the allegations against her younger brother.

26 39. Ms. DAVIS and Lorine filed claims against Ms. HARRISON twice in 2021 for civil
27 harassment and annoyance. All parties agreed to use mediation services to settle the cases.
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1 However, even after reaching settlements, Ms. HARRISON broke all agreements.

2 40. In February 2022, Ms. HARRISON was granted temporary conservatorship of Iman.
3 After Ms. HARRISON married Iman, she took him back to her residence in Washington Iman
4 remained in Ms. HARRISON's care until his death in October 2023.

5 41. On February 6, 2022, Ms. HARRISON started an online petition to the Sacramento
6 California Police Department through Change.org to send Ms. DAVIS to jail for allegedly
7 abusing Iman while he was in the hospital. The petition's description claims that Ms.
8 HARRISON was Iman's "love for 25 years" and lists multiple reasons that Ms. DAVIS should be
9 arrested, such as "illegally removed Imans phone and SIM card so he can't call his kids",
10 "blocked Imans children from calling or visiting the nursing home", and "tells Iman his wife is
11 keeping his kids from him to try and brainwash Iman." The petition, titled "Imans Army", is still
12 active with 84 signatures.

13 42. Ms. HARRISON also made a post on the Sacramento Crime Watch Facebook page
14 claiming Ms. DAVIS and Lorine mentally and physically abused Iman, kidnapped Iman and held
15 him hostage, and tried to kill Iman. Ms. HARRISON also posted false accusations regarding Ms.
16 DAVIS' and Lorine's association with Ashante's sexual abuse allegations.

17 43. While in Ms. HARRISON's care, Iman's health rapidly declined. Iman suffered from
18 sepsis multiple times. Ms. DAVIS was concerned about this decline, as Iman did not get sick or
19 suffer from deadly illnesses while he recovered in the hospital, as preventative health measures
20 prohibited this from occurring.

21 44. After Ms. DAVIS found out through another family member that Iman suffered sepsis for
22 the third time, she called Adult Protective Services (APS) on Ms. HARRISON. Ms. DAVIS'
23 family and friends also made multiple APS reports throughout the time Iman was in Ms.
24 HARRISON's care.

25 45. In September 2022, Ms. HARRISON called and left a threatening voicemail on Ms.
26 DAVIS' phone. Ms. HARRISON told Ms. DAVIS: "You're only f*cking yourself if you keep
27 calling APS, I'm going to tell you one more f*cking time, you're going to jail, no matter how
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1 many times you call, I'm going to make sure you go to jail, stop calling APS. Don't f*cking mess
2 with him again, I told you, don't play with Iman and let him be abused. You damn near killed
3 your brother. Have a nice f*cked up day."

4 46. Despite leaving the voicemail, Ms. HARRISON had not allowed Ms. DAVIS to talk to
5 Iman.

6 47. Ms. DAVIS told Ms. HARRISON to leave their family alone and blocked her phone
7 number. However, Ms. HARRISON called Ms. DAVIS from a new phone number and when Ms.
8 DAVIS answered, Iman spoke and said "Tashae". Immediately, Ms. HARRISON took the phone
9 and said: "Yeah, b*tch, we got K.K. locked up, don't ever call APS on us again." K.K. is Ms.
10 DAVIS' younger brother.

11 48. Ms. HARRISON recorded the phone call and posted the recording online in July 2023.

12 49. On March 6, 2023, Ms. HARRISON texted Ms. DAVIS a warning that Iman "asked" for
13 his personal belongings. However, these were items that Ms. HARRISON was supposed to pick
14 up in 2022 but did not. The only item Ms. DAVIS possessed was Iman's cell phone, which she
15 had already sent to Ms. HARRISON.

16 50. In July 2023, Ms. HARRISON's harassment of Ms. DAVIS increased. Ms. HARRISON
17 created new social media accounts to contact Ms. DAVIS' relatives and her current and former
18 friends stating her accusations of Ms. DAVIS' alleged abuse of Iman. In these numerous
19 messages to these contacts, Ms. HARRISON also associated Ms. DAVIS and her husband with
20 Ms. DAVIS' younger brother's unrelated sexual assault case. These relatives and friends have
21 contacted Ms. DAVIS to reveal Ms. HARRISON's actions and explain that they do not want to
22 be involved.

23 51. On July 12, 2023, Ms. HARRISON texted Ms. DAVIS two messages; both messages
24 were again from unknown phone numbers. The first message stated "Got him, I told you it was
25 temporary" about Ms. DAVIS' younger brother and the current accusations of sexual assault
26 against him. Ms. DAVIS messaged Ms. HARRISON to stop contacting her and to leave her
27 alone. The second text message was lengthier and came from a different phone number; this
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1 message included Ms. HARRISON's false claims against Ms. DAVIS, stating that Ms. DAVIS
2 "will not get away with any of this" and alleged Ms. DAVIS was "going to let them kill him."
3 Ms. DAVIS responded again to Ms. HARRISON to leave her alone and that she was a sick and
4 habitual liar.

5 52. On July 15, 2023, Ms. HARRISON left an angry "emoji" reaction on one of Ms. DAVIS'
6 public Facebook posts. This is how Ms. DAVIS discovered Ms. HARRISON's new Facebook
7 account. Ms. HARRISON used a picture of Ms. DAVIS and her siblings as her profile picture and
8 cover photo.

9 53. On July 18, 2023, Ms. HARRISON texted Ms. DAVIS, taunting her that Ms. DAVIS'
10 cousins do not believe Ms. DAVIS' words. Ms. DAVIS messaged her back to "stop harassing
11 [her] and lying on [her] and [her] family."

12 54. Ms. DAVIS learned that on every day in July, at almost every hour, Ms. HARRISON had
13 been posting multiple TikTok videos that included screen recordings and screenshots of Ms.
14 DAVIS' personal social media pages, her personal pictures and videos, and any personal text
15 messages between Ms. DAVIS and Ms. HARRISON. In these videos, Ms. HARRISON
16 continued to accuse Ms. DAVIS of abusing Iman during his recovery after his accident. Ms.
17 HARRISON claimed that Iman was sick and dying, that Ms. DAVIS took Iman hostage, and that
18 Ms. DAVIS is responsible if Iman dies.

19 55. These videos will also include videos of Ms. DAVIS that Ms. HARRISON recorded while
20 Ms. DAVIS walked out of the hospital where Iman was located. Ms. DAVIS did not consent to
21 any of the recordings Ms. HARRISON has posted.

22 56. Since 2021, Ms. DAVIS has had to limit who can comment on her posts or turn off the
23 comments section entirely due to harassment from those watching Ms. HARRISON's videos or
24 interacting with her posts. Ms. HARRISON will encourage her followers to harass Ms. DAVIS
25 and created a page with Ms. DAVIS's and Lorine's address specifically detailed "for those that
26 want to comment on Tashae's videos but can't."

27 57. Due to Ms. HARRISON's conduct, Ms. DAVIS and her husband feel unsafe. Not only is
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Ms. HARRISON harassing Ms. DAVIS, but she is also putting Ms. DAVIS' husband and children in danger. Ms. HARRISON alleges that Mr. Davis is abusive and uses drugs and has sold drugs to children at the high school he worked at. Ms. HARRISON is also revealing their home address and the full names of Ms. DAVIS' children through her TikTok videos. Further, Ms. DAVIS is unsure whether Ms. HARRISON sent people to stalk her family, as Ms. HARRISON has threatened that she knows Ms. DAVIS and her husband's personal and daily schedules.

58. Ms. DAVIS filed for and was granted a permanent restraining order against Ms. HARRISON in December 2023 for the maximum duration of 5 years. However, at present, Ms. HARRISON continues to defame Ms. DAVIS. On January 29, 2024, Ms. HARRISON created another Change.org petition demanding the Sacramento County Police Department reopen an investigation into Iman's case, where she claims he was a victim of "medical kidnapping". There are currently 77 out of 100 signatures, with many comments seeking justice for Iman and blaming Ms. DAVIS for his death.

FIRST CAUSE OF ACTION

DEFMANTION - Libel

(Brought by Plaintiff Ms. DAVIS, against Defendant)

59. Plaintiff re-alleges and incorporates each and every paragraph above as though fully stated herein.

60. From 2021 until the present day, Ms. HARRISON has engaged in defamatory conduct towards Ms. DAVIS by falsely assaulting her character and reputation through constant, written harassment online.

61. Defamation, by California law, involves 1) a publication, 2) that is false, 3) that is defamatory, 4) that is unprivileged, and 5) that has natural tendency to injure or that causes special damage. *Bowles v. Constellation Brands, Inc.* (2020) 444 F.Supp.3d 1161, 1172. In California, "defamation" may occur by means of libel or slander. Cal. Civ. Code § 44.

62. The publication must be an intentional statement of fact and must specifically refer to, or be of and concerning, the plaintiff; may be written or oral; and is a communication to some third person who understand both the defamatory meaning and its application to the defamed person.

1 *Bowles* at 1172.

2 63. An essential element of defamation is that the publication be a false statement rather than
3 opinion. *Id.* at 1174. This is a question of law for the courts due to the requirement that a
4 statement must contain a provable falsehood; however, a statement of opinion may still constitute
5 defamation if it implies false factual assertions about the defamed individual. *Id.*

6 64. A privileged publication is one without malice to a person interested therein 1) by one
7 who is also interested, or 2) by one who stands in such a relation to the person interested as to
8 afford a reasonable ground for supposing the motive for the communication to be innocent, or 3)
9 who is requested by the person interested to give the information. Cal. Civ. Code § 47(c).
10 California courts have found that this privilege applies where the communicator and the recipient
11 have a common interest and such communication is protected by the interest. *Cornell v. Berkeley*
12 *Tennis Club* (2017) 18 Cal.App.5th 908, 949. This interest “must be something other than mere
13 general or idle curiosity, such as where the parties to the communication share a contractual,
14 business, or similar relationship, or where the defendant is protecting his or her own pecuniary
15 interest.” *Id.* The plaintiff has the burden to show that the defamatory statement was published
16 with malice. *Bowles* at 1178. A general allegation of malice will not suffice; plaintiff must allege
17 detailed facts showing defendant’s ill will towards him. *Id.*

18 65. Special damage “means all damage that plaintiff alleges and proves that he or she has
19 suffered in respect to his or her property, business, trade, profession, or occupation, including the
20 amounts of money the plaintiff alleges and proves her or she has expended as a result of the
21 alleged libel, and no other.” Cal. Civ. Code § 48a(d)(2). However, if a defamation claim is
22 defamatory on its face, then it is actionable without proof of special damages. *Garcia v. City of*
23 *Merced* (2008) 637 F.Supp.3d 731, 754. This is called defamation per se and exists if in addition
24 to being defamatory on its face, the statement is also untrue. *Id.*

25 66. Generally, under California law, “libel” is a written communication that is false, that is not
26 protected by any privilege, and that exposes a person to contempt or ridicule or certain other
27 reputational injuries. *Bryant v. Lowe’s Home Centers, LLC* (2022) 628 F.Supp.3d 1036, 1042.

1 67. Here, Ms. HARRISON defamed Ms. DAVIS by making online libelous statements in
2 which she accused Ms. DAVIS of mentally and physically abusing Iman, kidnapping,
3 blackmailing, holding hostage, attempted murder, and murder. First, Ms. HARRISON published
4 her defamatory statements on platforms such as Facebook, Instagram, TikTok, GoFundMe,
5 Change.org, and YouTube. Ms. HARRISON made these excessive and unsolicited publications
6 of defamation of and concerning Ms. DAVIS to third persons. The third persons Ms. HARRISON
7 published the defamation to include but are not limited to family and friends of Ms. DAVIS and
8 online communities that are part of the Facebook groups Ms. HARRISON posted to, Ms.
9 HARRISON's Instagram, TikTok, and YouTube followers, commenters and subscribers, and
10 supporters of the GoFundMe and Change.org petitions.

11 68. Moreover, Ms. HARRISON's statements are false, defamatory statements of fact. Ms.
12 HARRISON was not stating an opinion when writing these statements online or saying these
13 statements on her TikTok and YouTube videos, as she is actively trying to convince these third
14 persons of the truth of her defamatory statements about Ms. DAVIS. As a result of Ms.
15 HARRISON's statements, many of her TikTok followers and commenters believed the
16 allegations that Ms. DAVIS abused her brother, kidnapped him, or tried to kill him. Thus, this
17 shows that any reasonable person can interpret Ms. HARRISON's defamatory statements as
18 stating actual facts about Ms. DAVIS. However, Ms. DAVIS did not abuse her brother, kidnap
19 him, or try to kill him. Thus, Ms. HARRISON's statements are false.

20 69. Ms. HARRISON made unprivileged statements of defamation against Ms. DAVIS
21 because these statements were made with malicious intent. When Ms. DAVIS prevented Ms.
22 HARRISON from visiting Iman while he recovered in the hospital, Ms. HARRISON's behavior
23 towards Ms. DAVIS and her family turned hostile. Ms. HARRISON's hostility towards Ms.
24 DAVIS increased when Ms. DAVIS called APS on Ms. HARRISON. Ms. HARRISON left
25 aggressive voicemails on Ms. DAVIS' phone and when she did speak to her and often used
26 explicit language in these phone calls. After these events, Ms. HARRISON took to posting her
27 severe claims of Iman's alleged abuse with the intent to harass Ms. DAVIS and tarnish her
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1 reputation. Additionally, these posts furthered Ms. HARRISON's motive to earn income through
2 Facebook, Instagram, GoFundMe, and CashApp, under the guise that donations are needed to
3 seek justice for Iman. As a result, Ms. HARRISON acted maliciously in posting these defamatory
4 statements.

5 70. Lastly, Ms. HARRISON's written statements are statements that are defamatory on
6 their face, Ms. HARRISON's direct written statements on social media and on her petitions,
7 accusing Ms. DAVIS of blackmail, abuse, kidnapping, holding hostage, attempted murder, and
8 murder of Iman subjected Ms. DAVIS to hatred and contempt. For example, Ms. DAVIS needed
9 to turn off her comments section on all of her public social media pages because those who saw
10 Ms. HARRISON's posts flooded Ms. DAVIS' pages with harassing language. Therefore, Ms.
11 HARRISON's allegations that Ms. DAVIS is guilty of abusing her brother, Iman, and thus should
12 be arrested injures Ms. DAVIS' reputation as an upstanding individual and ministry services, in
13 which she uses her social media to promote.

14 71. Thus, Ms. HARRISON should be held liable for defaming Ms. DAVIS through libel.

15 **SECOND CAUSE OF ACTION**

16 **DEFAMATION - Libel per se**

17 (Brought by Plaintiff Ms. DAVIS, against Defendant)

18 72. Plaintiff re-alleges and incorporates each and every paragraph above as though fully stated
19 herein.

20 73. Ms. HARRISON's defamation of Ms. DAVIS is considered libel per se as her written
21 accusations against Ms. DAVIS on its face subject her to hatred and contempt.

22 74. A statement is libelous per se if it defames the plaintiff on its face; in other words, it does
23 not need extrinsic evidence to explain the statement's defamatory nature. Cal. Civ. Code § 45a.
24 Material libelous per se is a false and unprivileged publication by writing which exposes any
25 person to hatred, contempt, ridicule, or obloquy, or which causes him [or her] to be shunned or
26 avoided, or which has a tendency to injure him in his occupation. *Washburn v. Wright* (1968) 261
27 Cal.App.2d 789, 797. An allegation that the plaintiff is guilty of a crime is libelous on its face.
28 *Fashion 21 v. Coalition for Human Immigrant Rights of Los Angeles* (2004) 117 Cal.App.4th

1 1138, 1145.

2 75. Here, Ms. HARRISON defamed Ms. DAVIS by making online libelous per se statements
3 in which she accused Ms. DAVIS of mentally and physically abusing Iman, kidnapping,
4 blackmailing, holding hostage, attempted murder, and murder. First, Ms. HARRISON published
5 her defamatory statements on platforms such as Facebook, Instagram, TikTok, GoFundMe,
6 Change.org, and YouTube. Ms. HARRISON made these excessive and unsolicited publications
7 of defamation of and concerning Ms. DAVIS to third persons. The third persons Ms. HARRISON
8 published the defamation to include but are not limited to family and friends of Ms. DAVIS and
9 online communities that are part of the Facebook groups Ms. HARRISON posted to, Ms.
10 HARRISON's Instagram, TikTok, and YouTube followers, commenters and subscribers, and
11 supporters of the GoFundMe and Change.org petitions.

12 76. Moreover, Ms. HARRISON's statements are false, defamatory statements of fact. Ms.
13 HARRISON was not stating an opinion when writing these statements online or saying these
14 statements on her TikTok and YouTube videos, as she is actively trying to convince these third
15 persons of the truth of her defamatory statements about Ms. DAVIS. As a result of Ms.
16 HARRISON's statements, many of her TikTok followers and commenters believed the
17 allegations that Ms. DAVIS abused her brother, kidnapped him, or tried to kill him. Thus, this
18 shows that any reasonable person can interpret Ms. HARRISON's defamatory statements as
19 stating actual facts about Ms. DAVIS. However, Ms. DAVIS did not abuse her brother, kidnap
20 him, or try to kill him. Thus, Ms. HARRISON's statements are false.

21 77. Ms. HARRISON made unprivileged statements of defamation against Ms. DAVIS
22 because these statements were made with malicious intent. When Ms. DAVIS prevented Ms.
23 HARRISON from visiting Iman while he recovered in the hospital, Ms. HARRISON's behavior
24 towards Ms. DAVIS and her family turned hostile. Ms. HARRISON's hostility towards Ms.
25 DAVIS increased when Ms. DAVIS called APS on Ms. HARRISON. Ms. HARRISON left
26 aggressive voicemails on Ms. DAVIS' phone and when she did speak to her and often used
27 explicit language in these phone calls. After these events, Ms. HARRISON took to posting her
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severe claims of Iman’s alleged abuse with the intent to harass Ms. DAVIS and tarnish her reputation. Additionally, these posts furthered Ms. HARRISON’s motive to earn income through Facebook, Instagram, GoFundMe, and CashApp, under the guise that donations are needed to seek justice for Iman. As a result, Ms. HARRISON acted maliciously in posting these defamatory statements.

78. Lastly, Ms. HARRISON’s written statements are statements that are defamatory on their face, Ms. HARRISON’s direct written statements on social media and on her petitions, accusing Ms. DAVIS of blackmail, abuse, kidnapping, holding hostage, attempted murder, and murder of Iman subjected Ms. DAVIS to hatred and contempt. For example, Ms. DAVIS needed to turn off her comments section on all of her public social media pages because those who saw Ms. HARRISON’s posts flooded Ms. DAVIS’ pages with harassing language. Therefore, Ms. HARRISON’s allegations that Ms. DAVIS is guilty of abusing her brother, Iman, and thus should be arrested injures Ms. DAVIS’ reputation as an upstanding individual and ministry services, in which she uses her social media to promote.

79. Thus, Ms. HARRISON should be held liable for defaming Ms. DAVIS through libel per se.

THIRD CAUSE OF ACTION

DEFAMATION- Slander

(Brought by Plaintiff Ms. DAVIS, against Defendant)

80. Plaintiff re-alleges and incorporates each and every paragraph above as though fully stated herein.

81. Ms. HARRISON slandered Ms. DAVIS through verbal statements she made to Ms. DAVIS’ friends and family, and to Ms. HARRISON’s social media followers, commentors, and subscribers.

82. “Slander” is a false and unprivileged oral communication or uttering certain other derogatory statements regarding a person. *Bryant v. Lowe’s Home Centers, LLC* (2022) 628 F.Supp.3d 1036, 1042.

83. First, Ms. HARRISON published her verbal defamatory statements through videos on

1 platforms such as Facebook, Instagram, TikTok, and YouTube. Ms. HARRISON made these
2 excessive and unsolicited publications of defamation of and concerning Ms. DAVIS to third
3 persons. The third persons Ms. HARRISON published the defamation to include but are not
4 limited to family and friends of Ms. DAVIS and online communities that are part of the Facebook
5 groups Ms. HARRISON posted to, Ms. HARRISON's Instagram, TikTok, and YouTube
6 followers, commenters and subscribers.

7 84. Moreover, Ms. HARRISON's statements are false, defamatory statements of fact. Ms.
8 HARRISON was not stating an opinion when saying these statements on her TikTok and
9 YouTube videos, as she is actively trying to convince these third persons of the truth of her
10 defamatory statements about Ms. DAVIS. As a result of Ms. HARRISON's statements, many of
11 her TikTok followers and commenters believed the allegations that Ms. DAVIS abused her
12 brother, kidnapped him, or tried to kill him. Thus, this shows that any reasonable person can
13 interpret Ms. HARRISON's defamatory statements as stating actual facts about Ms. DAVIS.
14 However, Ms. DAVIS did not abuse her brother, kidnap him, or try to kill him. Thus, Ms.
15 HARRISON's statements are false.

16 85. Ms. HARRISON made unprivileged statements of defamation against Ms. DAVIS
17 because these statements were made with malicious intent. When Ms. DAVIS prevented Ms.
18 HARRISON from visiting Iman while he recovered in the hospital, Ms. HARRISON's behavior
19 towards Ms. DAVIS and her family turned hostile. Ms. HARRISON's hostility towards Ms.
20 DAVIS increased when Ms. DAVIS called APS on Ms. HARRISON. Ms. HARRISON left
21 aggressive voicemails on Ms. DAVIS' phone and when she did speak to her and often used
22 explicit language in these phone calls. After these events, Ms. HARRISON took to posting her
23 severe claims of Iman's alleged abuse with the intent to harass Ms. DAVIS and tarnish her
24 reputation. Additionally, these posts furthered Ms. HARRISON's motive to earn income through
25 Facebook, Instagram, GoFundMe, and CashApp, under the guise that donations are needed to
26 seek justice for Iman. As a result, Ms. HARRISON acted maliciously in posting these defamatory
27 statements.
28

1 86. Lastly, Ms. HARRISON's verbal statements that are defamatory on their face. Ms.
2 HARRISON's made direct verbal statements to Ms. DAVIS' family and friends, and to her
3 followers or subscribers on social media, accusing Ms. DAVIS of blackmail, abuse, kidnapping,
4 holding hostage, attempted murder, and murder of Iman subjected Ms. DAVIS to hatred and
5 contempt. For example, Ms. DAVIS needed to turn off her comments section on all of her public
6 social media pages because those who saw Ms. HARRISON's posts flooded Ms. DAVIS' pages
7 with harassing language. Therefore, Ms. HARRISON's allegations that Ms. DAVIS is guilty of
8 abusing her brother, Iman, and thus should be arrested injures Ms. DAVIS' reputation as an
9 upstanding individual and ministry services, in which she uses her social media to promote.

10 87. Thus, Ms. HARRISON should be held liable for slandering Ms. DAVIS.

11 **FOURTH CAUSE OF ACTION**

12 **DEFAMATION - Slander per se**

13 (Brought by Plaintiff Ms. DAVIS, against Defendant)

14 88. Plaintiff re-alleges and incorporates each and every paragraph above as though fully stated
15 herein.

16 89. Ms. HARRISON defamed Ms. DAVIS through verbal statements she made to Ms.
17 DAVIS' friends and family, and to Ms. HARRISON's social media followers, commentors, and
18 subscribers, that are defamatory on their face.

19 90. A slander per se action is any false and privileged publication, orally uttered that 1)
20 charges any person with crime, or with having been indicted, convicted, or punished for crime, 2)
21 imputes in him the present existence of an infectious, contagious, or loathsome disease, 3) tends
22 to directly injure him in respect to his [or her] office, profession, trade or business, either by
23 imputing to him general disqualification in those respects which the office or other occupation
24 peculiarly requires, or by imputing something with reference to his office, profession, trade, or
25 business that has a natural tendency to lessen its profits, or 4) imputes to him impotence or want
26 of chastity. Cal. Civ. Code § 46.

27 91. First, Ms. HARRISON published her verbal defamatory statements through videos on
28 platforms such as Facebook, Instagram, TikTok, and YouTube. Ms. HARRISON made these

1 excessive and unsolicited publications of defamation of and concerning Ms. DAVIS to third
2 persons. The third persons Ms. HARRISON published the defamation to include but are not
3 limited to family and friends of Ms. DAVIS and online communities that are part of the Facebook
4 groups Ms. HARRISON posted to, Ms. HARRISON's Instagram, TikTok, and YouTube
5 followers, commenters and subscribers.

6 92. Moreover, Ms. HARRISON's statements are false, defamatory statements of fact. Ms.
7 HARRISON was not stating an opinion when saying these statements on her TikTok and
8 YouTube videos, as she is actively trying to convince these third persons of the truth of her
9 defamatory statements about Ms. DAVIS. As a result of Ms. HARRISON's statements, many of
10 her TikTok followers and commenters believed the allegations that Ms. DAVIS abused her
11 brother, kidnapped him, or tried to kill him. Thus, this shows that any reasonable person can
12 interpret Ms. HARRISON's defamatory statements as stating actual facts about Ms. DAVIS.
13 However, Ms. DAVIS did not abuse her brother, kidnap him, or try to kill him. Thus, Ms.
14 HARRISON's statements are false.

15 93. Ms. HARRISON made unprivileged statements of defamation against Ms. DAVIS
16 because these statements were made with malicious intent. When Ms. DAVIS prevented Ms.
17 HARRISON from visiting Iman while he recovered in the hospital, Ms. HARRISON's behavior
18 towards Ms. DAVIS and her family turned hostile. Ms. HARRISON's hostility towards Ms.
19 DAVIS increased when Ms. DAVIS called APS on Ms. HARRISON. Ms. HARRISON left
20 aggressive voicemails on Ms. DAVIS' phone and when she did speak to her and often used
21 explicit language in these phone calls. After these events, Ms. HARRISON took to posting her
22 severe claims of Iman's alleged abuse with the intent to harass Ms. DAVIS and tarnish her
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24 Facebook, Instagram, GoFundMe, and CashApp, under the guise that donations are needed to
25 seek justice for Iman. As a result, Ms. HARRISON acted maliciously in posting these defamatory
26 statements.

27 94. Lastly, Ms. HARRISON's verbal statements are statements are that are defamatory on
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1 their face. Ms. HARRISON's made direct verbal statements to Ms. DAVIS' family and friends,
 2 and to her followers or subscribers on social media, accusing Ms. DAVIS of blackmail, abuse,
 3 kidnapping, holding hostage, attempted murder, and murder of Iman subjected Ms. DAVIS to
 4 hatred and contempt. For example, Ms. DAVIS needed to turn off her comments section on all of
 5 her public social media pages because those who saw Ms. HARRISON's posts flooded Ms.
 6 DAVIS' pages with harassing language. Therefore, Ms. HARRISON's allegations that Ms.
 7 DAVIS is guilty of abusing her brother, Iman, and thus should be arrested injures Ms. DAVIS'
 8 reputation as an upstanding individual and ministry services, in which she uses her social media
 9 to promote.

10 95. Thus, Ms. HARRISON should be held liable for defaming Ms. DAVIS through slander
 11 per se.

12 **FIFTH CAUSE OF ACTION**

13 Intentional Infliction of Emotional Distress
 14 (Brought by Plaintiff Ms. DAVIS, against Defendant)

15 96. Plaintiff re-alleges and incorporates each and every paragraph above as though fully stated
 16 herein.

17 97. Since 2021, Ms. HARRISON has intentionally inflicted emotional, mental, and physical
 18 distress on Ms. DAVIS as a result of Ms. HARRISON's continuous harassment in making
 19 defamatory statements concerning Ms. DAVIS.

20 98. In California, to establish a claim for intentional infliction of emotional distress, plaintiff
 21 must show that: 1) the defendant's conduct was extreme and outrageous, that is, conduct so
 22 extreme as to exceed all bounds of decency in a civilized community, with the 2) intent to cause,
 23 or with reckless disregard to the probability of causing, emotional distress, 3) as a result, the
 24 plaintiff suffered extreme or severe emotional distress. *Berry v. Frazier* (2023) 90 Cal.App.5th
 25 1258, 1273. Moreover, "it must be conducted directed at the plaintiff, or occur in the presence of
 26 the plaintiff of whom the defendant is aware." *Id.* This requirement separates intentional infliction
 27 of emotional distress from negligent emotional distress. *Id.*

28 99. Here, as a result of Ms. HARRISON's conduct in defaming Ms. DAVIS by accusing her

1 of abusing her brother, kidnapping and holding him hostage, and attempting to murder Iman, Ms.
2 DAVIS suffered severe emotional distress. Ms. HARRISON's conduct in harassing Ms. DAVIS
3 through her postings is extreme and outrageous because of how often she uploads content or
4 makes a new post with her allegations. Instead of creating one or two posts that included
5 defamatory statements against Ms. DAVIS, Ms. HARRISON continuously posts new content on
6 social media every day at almost every hour. These posts not only include Ms. HARRISON's
7 accusations, but has also revealed Ms. DAVIS' full name, her address, and where to find her on
8 social media so that third persons can leave troublesome comments. Ms. HARRISON would also
9 record Ms. DAVIS and use Ms. DAVIS' image and likeness without her consent. This conduct is
10 so extreme that it exceeds all bounds of decency in a civilized community as it is harassing
11 behavior with disregard for Ms. DAVIS' safety in her own home and on her personal and public
12 profiles.

13 100. Second, Ms. HARRISON acted recklessly with an intent to cause emotional distress to
14 Ms. DAVIS because by continuously posting these false accusations and revealing her personal
15 information to the public, Ms. HARRISON wanted to annoy Ms. DAVIS with actions that could
16 jeopardize her safety. Moreover, any time that Ms. HARRISON would message or speak to Ms.
17 DAVIS' family and friends to spread lies and false rumors about Ms. DAVIS and her family, this
18 would be equally bothersome as it harms Ms. DAVIS' reputation. Ms. HARRISON's goal to
19 obtain money through these donations that Ms. HARRISON claims would assist in seeking
20 justice for Iman is a motive for the constant harassment of Ms. DAVIS. As a result of Ms.
21 HARRISON's actions, Ms. DAVIS suffered severe emotional distress.

22 101. Lastly, as a result of Ms. HARRISON's harassment and continued annoyance, Ms.
23 DAVIS has suffered so much emotional, mental, and physical distress that she filed for and was
24 granted a restraining order against Ms. HARRISON in December 2023. Although the restraining
25 order was granted, Ms. HARRISON continues to create content defaming Ms. DAVIS, such as
26 the most recent Change.org petition. Ms. DAVIS is currently grieving her brother's death, which
27 is another emotionally distressing event that she cannot process properly due to Ms.
28

HARRISON's persistent posts.

102. Therefore, Ms. HARRISON has intentionally inflicted emotional distress onto Ms. DAVIS.

WHEREFORE, Plaintiff prays for relief as hereinafter set forth.

WHEREFORE, Plaintiff demands judgment against Defendants as follows:

1. Compensatory damages in an amount to be proven at trial;
2. For General damages in the amount of \$1,000,000.00.
3. For interest on the amount of compensatory damages;
4. For any and all penalties to the max amount as provided by law;
5. For reasonable attorney's fees pursuant to applicable law;
6. For costs of suit pursuant to applicable law;
7. For injunctive relief ordering Defendant to stop posting defamatory content about Plaintiff and using Plaintiff's name and image in the content;
8. For any other further relief that the court considers proper.

Date: February 16, 2024



Kellan Patterson, Attorney for
TASHAE DAVIS